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7 *Attorneys for Plaintiff*

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 J.C.,

11 Plaintiff,

12 v.

13 MINDGEEK S.A.R.L. a foreign entity;  
14 MG FREESITES LTD, a foreign entity;  
15 MINDGEEK USA INCORPORATED,  
a Delaware corporation; MG  
16 PREMIUM LTD, a foreign entity; MG  
GLOBAL ENTERTAINMENT INC., a  
17 Delaware corporation; 9219-1568  
QUEBEC, INC., a foreign entity;  
18 BERND BERGMAIR, a foreign  
individual; FERAS ANTOON, a  
foreign individual; DAVID  
19 TASSILLO, a foreign individual; VISA  
INC., a Delaware corporation;  
20 REDWOOD CAPITAL  
MANAGEMENT, LLC, a Delaware  
21 limited liability company; REDWOOD  
DOE FUNDS 1-7; COLBECK  
22 CAPITAL MANAGEMENT, LLC, a  
Delaware limited liability company;  
23 COLBECK DOE FUNDS 1-3,

24 Defendants.

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CASE NO. 24-cv-04971

**PLAINTIFF'S NOTICE OF  
RELATED CASES**

1 J.C. hereby files this Notice of Related Cases under Central District of  
2 California Local Rule 83-1.3.1. The following cases have a substantial overlap in  
3 defendants and have some of the same factual allegations. It would further the  
4 interests of judicial efficiency to have them heard by the same judge.

5 1. *Jane Doe v. MindGeek USA Incorporated et al.*, Case No. 8:21-cv-  
6 00338-WLH-ADS, filed on February 19, 2021 in this District Court, is currently  
7 pending before the Honorable Wesley L. Hsu. This is a class action seeking  
8 damages and injunctive relief against defendants – (i) MindGeek USA  
9 Incorporated (ii) MindGeek S.A.R.L.; (iii) MG Freesites, Ltd., (d/b/a Pornhub);  
10 (iv) MG Freesites II, Ltd.; (v) MG Content RT Limited; and (vi) 9219-1568  
11 Quebec Inc. (d/b/a MindGeek) – based on allegations that defendants violated the  
12 Trafficking Victims Protection Reauthorization Act (“TVPRA”), specifically  
13 18 U.S.C. §§ 1591 and 1595, among other laws, by financially benefiting from, or  
14 otherwise participating in, a sex trafficking venture in which plaintiff and members  
15 of the class were victims. Further, plaintiff alleges that the defendants violated 18  
16 U.S.C. § 2258A by failing to report child sexual abuse materials on their websites  
17 and 18 U.S.C. § 2252A for knowingly receiving and distributing child  
18 pornography depicting plaintiff and the class on their websites. Plaintiff also  
19 asserts state statutory and common law violations. On November 17, 2023, the  
20 Court granted Plaintiff’s Motion for Class Certification and certified under both  
21 Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3) two classes. (Dkt. 209,  
22 Order Granting Plaintiff’s Motion for Class Certification, *Jane Doe v. MindGeek*  
23 *USA Incorporated et al.*, Case No. 8:21-cv-00338-WLH-ADS (C.D. Cal. 2021).)  
24 The Court first certified a national class including “all persons who were under the  
25 age of 18 when they appeared in a video or image that has been uploaded or  
26 otherwise made available for viewing on any website owned or operated by  
27 Defendants in the last ten years.” (Dkt. 107 at 44, ¶ 154.) The Court next certified  
28 a subclass of “all persons residing in California who were under the age of 18

1 when they appeared in a video or image that has been uploaded or otherwise made  
2 available for viewing on any website owned or operated by Defendants in the last  
3 ten years.” (*Id.* at ¶ 155.) Plaintiff in this related action is represented by the  
4 following counsel: Susman Godfrey L.L.P. and Pollock Cohen LLP.

5       2. *Serena Fleites v. MindGeek S.A.R.L. et al.*, Case No. 2:21-cv-4920-  
6 WLH-ADS, filed on June 17, 2021 in this District Court, is currently pending  
7 before the Honorable Wesley L. Hsu. Plaintiff in this case is seeking damages and  
8 injunctive relief against defendants – (i) MindGeek S.A.R.L.; (ii) MG Freesites,  
9 Ltd. d/b/a Pornhub; (iii) MindGeek USA Incorporated; (iv) MG Premium Ltd.;  
10 (v) MG Global Entertainment, Inc.; (vi) 9219-1568 Quebec, Inc.; (vii) Bernd  
11 Bergmair; (viii) Feras Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood  
12 Capital Management, LLC<sup>1</sup>; and (xii) Colbeck Capital Management, LLC<sup>2</sup> – for  
13 sex trafficking and conspiracy to benefit from a trafficking venture in violation of  
14 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and possession of child  
15 pornography in violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state  
16 statutory and common law violations. Plaintiff in this related action is represented  
17 by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

18       3. *K.A. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04786-JFW-  
19 MAA, filed on June 7, 2024 in this District Court, is currently pending before the  
20 Honorable John F. Walter and the Honorable Maria A. Audero. Plaintiff in this  
21 case is seeking damages and injunctive relief against defendants – (i) MindGeek  
22 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA  
23 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
24 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras

25  
26 <sup>1</sup> Plaintiff also named as defendants certain related funds of Redwood Capital  
27 Management, LLC, the names of which were filed under seal.

28 <sup>2</sup> Plaintiff also named as defendants certain related funds of Colbeck Capital  
Management, LLC, the names of which were filed under seal.

1 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
2 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
3 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
4 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
5 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
6 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
7 in this related action is represented by the following counsel: Brown Rudnick LLP  
8 and Olson Stein LLP.

9 4. *N.L. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04788-MWF-  
10 AGR, filed on June 7, 2024 in this District Court, is currently pending before the  
11 Honorable Michael W. Fitzgerald and the Honorable Alicia G. Rosenberg.  
12 Plaintiff in this case is seeking damages and injunctive relief against defendants –  
13 (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek  
14 USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
15 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras  
16 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
17 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
18 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
19 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
20 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
21 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
22 in this related action is represented by the following counsel: Brown Rudnick LLP  
23 and Olson Stein LLP.

24 5. *L.T. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04791-JFW-PVC,  
25 filed on June 7, 2024 in this District Court, is currently pending before the  
26 Honorable John F. Walter and the Honorable Pedro V. Castillo. Plaintiff in this  
27 case is seeking damages and injunctive relief against defendants – (i) MindGeek  
28 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA

1 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
2 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras  
3 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
4 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
5 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
6 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
7 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
8 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
9 in this related action is represented by the following counsel: Brown Rudnick LLP  
10 and Olson Stein LLP.

11 6. *T.C. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04795-MRA-PD,  
12 filed on June 7, 2024 in this District Court, is currently pending before the  
13 Honorable Monica Ramirez Almadani and the Honorable Patricia Donahue.  
14 Plaintiff in this case is seeking damages and injunctive relief against defendants –  
15 (i) MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek  
16 USA Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
17 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras  
18 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
19 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
20 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
21 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
22 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
23 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
24 in this related action is represented by the following counsel: Brown Rudnick LLP  
25 and Olson Stein LLP.

26 7. *X.N. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04800-DMG-KS,  
27 filed on June 7, 2024 in this District Court, is currently pending before the  
28 Honorable Dolly M. Gee and the Honorable Karen L. Stevenson. Plaintiff in this

1 case is seeking damages and injunctive relief against defendants – (i) MindGeek  
2 S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA  
3 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
4 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras  
5 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
6 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
7 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
8 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
9 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
10 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
11 in this related action is represented by the following counsel: Brown Rudnick LLP  
12 and Olson Stein LLP.

13 8. *N.Y. v. MindGeek S.A.R.L. et al.*, Case No. 2:24-cv-04801-CBM-JPR,  
14 filed on June 7, 2024 in this District Court, is currently pending before the  
15 Honorable Consuelo B. Marshall and the Honorable Jean P. Rosenbluth. Plaintiff  
16 in this case is seeking damages and injunctive relief against defendants – (i)  
17 MindGeek S.A.R.L.; (ii) MG Freesites, Ltd., d/b/a Pornhub; (iii) MindGeek USA  
18 Incorporated; (iv) MG Premium Ltd.; (v) MG Global Entertainment Inc.; (vi)  
19 9219-1568 Quebec, Inc., d/b/a MindGeek; (vii) Bernd Bergmair; (viii) Feras  
20 Antoon; (ix) David Tassillo; (x) Visa Inc.; (xi) Redwood Capital Management,  
21 LLC; (xii) Redwood Doe Funds 1-7; (xiii) Colbeck Capital Management, LLC;  
22 and (xiv) Colbeck Doe Funds 1-3 – for sex trafficking and conspiracy to benefit  
23 from a trafficking venture in violation of 18 U.S.C. §§ 1591, 1594, and 1595, for  
24 receipt, transport, and possession of child pornography in violation of 18 U.S.C. §§  
25 2252, 2252A, and 2255, and state statutory and common law violations. Plaintiff  
26 in this related action is represented by the following counsel: Brown Rudnick LLP  
27 and Olson Stein LLP.  
28

1 DATED: June 12, 2024

Respectfully submitted,

2 **BROWN RUDNICK LLP**

3  
4 By: /s/ Michael J. Bowe

5 Michael J. Bowe

6 (*pro hac vice* application forthcoming)

7 Lauren Tabaksblat

8 (*pro hac vice* application forthcoming)

9 *Attorneys for Plaintiff*